

EXHIBIT B

Anthony Irpino

From: Pearl Robertson
Sent: Wednesday, March 25, 2020 12:40 PM
To: David R. Cohen (David@SpecialMaster.Law); Sharon Desh
Cc: Anthony Irpino; Peter Mougey; jgaddy@levinlaw.com; Laura Dunning; Hunter Shkolnik; Salvatore C. Badala; Kate Swift; Kaspar Stoffelmayr
Subject: Agenda Items 232 and 253 & Walgreens' Privilege Challenges to Plaintiffs

Special Master Cohen,

Consistent with Sharon's recent email, the parties have been discussing ways to resolve Plaintiffs' long outstanding privilege challenges. In short, and as detailed in the highlighted sentence below, Plaintiffs are willing to attempt further efforts to meet and confer (with some oversight on your part) prior to requiring *in camera* review, and we believe that Walgreens is genuinely interested in same. We respect and appreciate the substance and tone of discussions with Walgreens since the 3/9 hearing in D.C. Walgreens does appear to have taken to heart your admonitions to be more cooperative and productive. Plaintiffs are cautiously optimistic we can move forward with Walgreens in a collaborative manner to address the many outstanding privilege issues – as Plaintiffs have already done with nearly all other Defendants.

With the above in mind, Plaintiffs are willing to look and move forward. Accordingly, the following is how Plaintiffs and Walgreens will proceed:

Plaintiffs and Walgreens will meet and confer regarding Plaintiffs' March 2019 & September 2019 (Agenda Item #232) and February 2020 (Agenda Item #253) privilege challenges to certain entries on Walgreens' Track 1A privilege logs and will meet and confer regarding Walgreens' February 2020 privilege challenges to certain entries on Cuyahoga's Track 1A privilege log. The parties have agreed to provide substantive, written responses to the outstanding challenges by April 3, 2020, which shall include identification of documents both parties are willing to downgrade as well as enhanced descriptions to certain privilege claims, as appropriate. Thereafter, the Parties will set a telephonic meet and confer to discuss questions related to review of the responses as well as further narrow disputes. Because both Parties believe they have strong arguments to challenge and withhold documents on grounds of privilege, we respectfully request your participation in the first meet and confer (and potentially others) to ensure collaborative progress is made as the meet and confer process is intended to be applied with/to privilege issues that may arise in CT1B.

If you need any further information, or have concerns with any of the above, we are available to discuss at any time.

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